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04-LOD-0009

NOV 24 2003

Mr. A. W. Conklin, Supervisor  
Air Emission and Defense Waste Section  
State of Washington Department of Health  
P. O. Box 47827  
Olympia, Washington 98504

**RECEIVED**  
APR 14 2004

**EDMC**

Dear Mr. Conklin:

**NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAP)  
TITLE V INSPECTION RESPONSE FOR EP-3720-01-S, AUDIT #217**

In response to the Washington State Department of Health (WDOH) letter to J. B. Hebdon, RL, from A. W. Conklin, #AIR 01-1106 Audit #217, dated November 15, 2001, Title V Level II inspection of emission unit EP-3720-01-S, an action required an evaluation of the 3720 emission unit be conducted by November 30, 2003. This evaluation would lead to a formal decision to replace fans/high-efficiency particulate air (HEPA) filters or to permanently close the facility. It has been determined that the facility will be closed.

The 3720 Building has been vacated; chemicals and radioactive materials associated with research and development and facility function are being removed, and the facility is being prepared for reassignment to another Hanford Contractor as part of the facility transition process. The need to maintain fire suppression systems within the facility (based on radiological hold-up) is currently being reviewed. With respect to the Hanford Site Air Operating Permit requirements, one of the following two options will be implemented depending on the outcome of the analysis.

Option 1 -- If it is determined that the fire suppression system is not needed, the facility exhaust can be permanently shut down as freeze protection will not be an issue. Once the exhaust is shut down, the electrical supply to the exhaust fans would be disconnected and the stack would be capped. In accordance with Washington Administrative Code 246-247-080(6), a report of closure will be submitted to the WDOH to document cessation of radionuclide emitting activities. The report will also provide a basis for removal of the emission unit from the Hanford Site Air Operating Permit #00-05-006.

Mr. A. W. Conklin  
04-LOD-0009

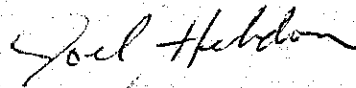
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Option 2 – If it is determined that the fire suppression system must be maintained, the facility exhaust system will need to be maintained operable in order to provide needed freeze protection. If this alternative is selected, sampling of radioactive air emissions from emission point EP-3720-01-S would continue. Testing of the HEPA filter efficiencies would continue to be performed on a quarterly basis, as agreed with WDOH during the CY 01 NESHAPS inspection for this emission unit. At this point, the only radioactive material in the facility would be hold-up. We would work with WDOH to downgrade this exhaust system from a "major" to a "minor," and determine an appropriate level of emissions measurement for this unit.

Should you have any questions or require additional information regarding this submittal, please contact Theresa Aldridge, Laboratory Operations Division, on (509) 372-4508, or Mary Jarvis of my staff, on (509) 376-2256.

Sincerely,



Joel Hebdon, Director  
Regulatory Compliance and Analysis Division

LOD:TLA

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